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May 28, 2020

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Consent Letter Motion

RE: United States v. Almaleh and Iotova, 17 Cr. 25 (ER)

Your Honor:

I am writing to request (with the consent of the government to the specific terms outlined below) that the Court order that I be allowed to retain the passports of both defendants, which were previously released by the Court to me from the New York Office of Pre-Trial Services, so that I can continue to accompany them to various offices where they are applying for public benefits, such as subsidized housing, Medicaid, a New York State non-driver ID card for Mr. Almaleh, and Social Security Disability Benefits (to be reinstated) for Mr. Almaleh. (I have been deputized by co-counsel for Mr. Almaleh to provide assistance to him as well as my client, Ms. Iotova). Pursuant to the terms of the Court's previous order I am supposed to return the passports to Pre-Trial tomorrow.

Since the passports were released to me a few weeks ago I have been able to get both defendants onto SNAP (food stamp) benefits, to get records from a bank to show Social Security that they have no open accounts, and to deal with a Supervisor in Social Security to get Mr. Almaleh reinstated to SSI benefits (not quite finalized).

But because the Department of Motor Vehicles is not yet open, nor have we been able to work out anything yet on the housing benefits (we continue to have

them reside at a low-cost hotel that we attorneys are paying for).

Thus, I probably need another month or so to have the passports available in case we need to present them to officials (definitely for Motor Vehicles, whenever they open, because otherwise we will not have enough proof of identity to get a non-driver's ID for Mr. Almaleh).

I have communicated with AUSA Robert Sobelman who has no objection provided that I continue to abide by the restrictions we agreed to previously (namely that I will hold the passports and only produce them when I am with the clients in person to show them to whatever agency needs to see them).

Thank you.

Sincerely,

/s/ Thomas H. Nooter

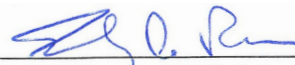
Thomas H. Nooter

Attorney for Defendant Iotova

cc: AUSA Robert Sobelman, Esq., by ECF
PTSA Erin Cunningham, by email

The application is GRANTED. Counsel for defendants will return the defendants' passports to Pre-Trial Services by Monday, July 6, 2020.

SO ORDERED.



Edgardo Ramos, U.S.D.J

Dated: May. 28, 2020

New York, New York